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FILED '08 NOV 6 13:11 USDC-ORP

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF OREGON
10

11 Lisa Aasen,

12 Plaintiff,

Case No. **CV '08 - 1306** PK

13 v.

14 COMPETITION SPECIALTIES, INC.,

15 Defendant.

COMPLAINT
(Job Discrimination: Title VII & state law)

DEMAND FOR JURY

16 Plaintiff alleges that at relevant times:
17

18 **JURISDICTION & VENUE**

19 1. These claims arise under the Civil Rights Act of 1964, 42 USC §2000e et.
20 seq., as amended (Title VII), and state law. This court has jurisdiction over the federal
21 claims under 28 USC §1331. This Court has jurisdiction over the state law claims pursuant
22 to the doctrine of supplemental jurisdiction, 28 USC § 1367(a) and because the parties are
23 diverse, 28 USC § 1332.
24

25 2. Venue is proper in the District of Oregon, Portland, because defendant
26 employed plaintiff in Multnomah County, Oregon.

PAGE 1 - COMPLAINT AND JURY DEMAND

1 **ALLEGATIONS OF PARTY STATUS**

2 3. Plaintiff, Lisa Aasen, is female, a citizen of the United States, and resides in
3 Portland, Oregon.

4 4. Defendant, Competition Specialties, Inc. is a Washington Corporation that
5 does business in Oregon. At relevant times, it employed 15 or more employees.
6

7 **FIRST CLAIM FOR RELIEF**
(Title VII)

8 5. Defendant hired Ms. Aasen beginning May 23, 2006 for work at its Portland
9 facility.

10 6. During Ms. Aasen's employment, Defendant subjected Ms. Aasen to unlawful
11 discrimination and / or retaliation because of her gender, including in one or more of the
12 following particulars:
13

14 A. by creating and / or maintaining a hostile work environment and / or
15 failing to take immediate and effective action designed to end sexual harassment;

16 B. by failing to adequately train, control and / or supervise its Portland
17 employees, both supervisory and non-supervisory;
18

19 7. Defendant constructively discharged Ms. Aasen on or about June 5, 2007.

20 8. Plaintiff met administrative prerequisites. The administrative agency found
21 substantial evidence of discrimination, and plaintiff obtained right to sue letters. Plaintiff
22 filed this complaint timely.

23 9. Defendant conducted itself with malice and / or reckless indifference to Ms.
24 Aasen's federally-protected rights, and defendant should pay punitive damages.
25
26

PAGE 2 - COMPLAINT AND JURY DEMAND

1 10. Ms. Aasen suffered pecuniary losses, emotional pain, suffering,
2 inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses. She
3 seeks the maximum damages allowed pursuant to 42 USC § 1981a.

4 11. Ms. Aasen suffered a loss of back pay, and she seeks back pay with interest.

5 12. Ms. Aasen seeks payment for attorney fees, expert witness fees and other
6 costs payable under law and court rules.

7
8 **SECOND CLAIM FOR RELIEF**
 (b) (ORS Chapter 659A)

9 **Count 1 - Harassment**

10 13. Ms. Aasen realleges paragraphs 1 through 9.

11 14. Defendant violated ORS 659A.030(1)(b).

12 15. Ms. Aasen seeks compensatory damages or \$200, whichever is greater, plus
13 punitive damages, attorney fees, expert witness fees, prevailing party fees, and other costs
14 payable under law and court rules, including ORS 659A.885 and ORS 20.107.

15
16 **Count 2 - Discharge**

17 16. Ms. Aasen realleges paragraphs 1 through 9.

18 17. Defendant violated ORS 659A.030(1)(a)

19 18. Ms. Aasen seeks compensatory damages or \$200, whichever is greater, plus
20 back pay, punitive damages, attorney fees, expert witness fees, prevailing party fees, and
21 other costs payable under law and court rules, including ORS 659A.885 and ORS 20.107.

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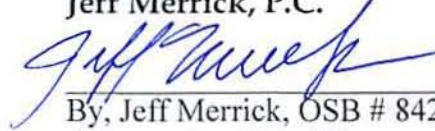
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DEMAND FOR JURY TRIAL

19. Ms. Aasen requests trial by jury.

Dated: 11-3-2008

Jeff Merrick, P.C.



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